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2/25/14

**Palumbo, Janice**

**From:** Palumbo, Janice  
**Sent:** Tuesday, February 25, 2014 4:35 PM  
**To:** RueAnn Thomas (rthomas@natturagroup.com)  
**Cc:** MacDonald, Jennifer; Fuentes, Rene  
**Subject:** Comments on Third Quarter 2013 O and M Report - Remedial Action Pilot Study

Dear Rue Ann,

EPA has reviewed the above-referenced report and has the following comments:

- 1) Provide cross sections of the groundwater plume so that we can have a three dimensional representation of the plume, especially in the area to the Northwest and areas where the shallow and the deep wells overlap, such as the section from MW-28 to MW-18, to assure that it depicts both the shallow and the deep contaminant zones and the respective PCP concentrations in both. Use the February 2013 data set, or a newer one with all the wells sampled.
- 2) The report covers activities from July 1, 2013 – September 30, 2013. The most recent data provided is dated August, 2013, but the most recent isopleth map of the deeper zone is dated February 2013. Provide isopleth maps for the most recent data.
- 3) The vertical groundwater graph for well pairs 25 and 32 shown in Figure 6 shows a significant variation in gradient in the last four quarters shown. The text on page 4 attributes these changes to human error. However, since the dramatic change in gradient has occurred twice, it seems unlikely that it is due to an error. Provide an explanation for these changes in the text on page 4.

In accordance with Paragraph XII of the Administrative Order on Consent, Docket No. RCRA-10-2001-0086, provide a response to these comments within sixty days from the date of this email. Thank you. –Jan

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